

EXHIBIT 30

<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF VIRGINIA</p> <p>3 Richmond Division</p> <p>4</p> <p>5 -----+</p> <p>6 ePLUS iNC., </p> <p>7 Plaintiff, </p> <p>8 vs. Civil Action No.</p> <p>9 3:09-CV-620 (JRS)</p> <p>10 LAWSON SOFTWARE, INC., </p> <p>11 Defendant. </p> <p>12 -----+</p> <p>13 Videotaped 30(b)(6) Deposition of</p> <p>14 LAWSON SOFTWARE, INC.</p> <p>15 BY AND THROUGH ITS REPRESENTATIVE</p> <p>16 JEFFREY L. HVASS</p> <p>17 Washington, DC</p> <p>18 June 8, 2010</p> <p>19 10:00 a.m.</p> <p>20 Job No. 1-180349</p> <p>21 Pages 1 - 252</p> <p>22 Reported by: Michele E. Eddy, RPR, CRR, CLR</p>	<p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 ON BEHALF OF THE PLAINTIFF:</p> <p>4 MICHAEL STRAPP, ESQUIRE</p> <p>5 Goodwin Procter</p> <p>6 Exchange Place</p> <p>7 53 State Street</p> <p>8 Boston, Massachusetts 02109</p> <p>9 Telephone: (617) 570-1658</p> <p>10 - AND -</p> <p>11 JAMES D. CLEMENTS, ESQUIRE</p> <p>12 JENNIFER A. ALBERT, ESQUIRE</p> <p>13 Goodwin Procter</p> <p>14 901 New York Avenue, Northwest</p> <p>15 Washington, DC 20001</p> <p>16 Telephone: (202) 346-4000</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p>1 Videotaped Deposition of</p> <p>2 JEFFREY L. HVASS</p> <p>3</p> <p>4 Held at the offices of:</p> <p>5 GOODWIN PROCTER, LLP</p> <p>6 901 New York Avenue, Northwest</p> <p>7 Washington, DC 20001</p> <p>8 (202) 346-4000</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16 Pursuant to Notice, before Michele E. Eddy,</p> <p>17 Registered Professional Reporter, Certified Realtime</p> <p>18 Reporter, and Notary Public in and for the District of</p> <p>19 Columbia.</p> <p>20</p> <p>21</p> <p>22</p>	<p>1 ATTENDANCE, Continued</p> <p>2</p> <p>3 ON BEHALF OF THE DEFENDANT:</p> <p>4 WILLIAM D. SCHULTZ, ESQUIRE</p> <p>5 Merchant & Gould</p> <p>6 3200 IDS Center</p> <p>7 80 South Eighth Street</p> <p>8 Minneapolis, Minnesota 55402</p> <p>9 Telephone: (612) 332-5300</p> <p>10</p> <p>11 ALSO PRESENT:</p> <p>12 David Bayles, Videographer</p> <p>13 Brooks L. Hilliard, CMC, CCP</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>

<p>13</p> <p>1 mean by you got online to see the systems running</p> <p>2 live?</p> <p>3 A I had two interfaces put on my machine, and</p> <p>4 one was to get on a UNIX server for the 5.0 and 6.0</p> <p>5 systems, and then I also got a user interface to get</p> <p>6 on the 6.1 system, which is in the AS/400 system. And</p> <p>7 then I signed on to our systems and then brought up</p> <p>8 each of the application modules and reviewed them and</p> <p>9 processed transactions and got them running in the</p> <p>10 system and set up some data so systems could run.</p> <p>11 Q Who put the two interfaces on your machine?</p> <p>12 A A gentleman by the name of Roger Shimada did</p> <p>13 that work for me from Lawson.</p> <p>14 Q And where did he obtain those interfaces to</p> <p>15 put on your machine?</p> <p>16 A From Lawson's corporate MIS group supplied</p> <p>17 those.</p> <p>18 Q Can you describe for me what each of those</p> <p>19 interfaces consist of?</p> <p>20 A One is an IBM piece of software that</p> <p>21 provides a 5150 emulation to a 6.1 AS/400 system.</p> <p>22 Another one is a UNIX Telnet session that provides the</p>	<p>15</p> <p>1 A Roger Shimada.</p> <p>2 Q How do you spell his last name?</p> <p>3 A I couldn't tell you. I could get it for you</p> <p>4 if you need it.</p> <p>5 Q Well, let me back up a minute. Are these --</p> <p>6 are these systems that you're familiar with from your</p> <p>7 personal experience at Lawson?</p> <p>8 A Yes.</p> <p>9 Q How long have you been employed at Lawson?</p> <p>10 A 27 years.</p> <p>11 Q So you began working at Lawson in 1983?</p> <p>12 A 1983 is correct.</p> <p>13 Q Can you briefly review for me the various</p> <p>14 positions you've held at Lawson starting with your</p> <p>15 first job there in 1983?</p> <p>16 A I was hired in -- on May 2nd of 1983 to be a</p> <p>17 system 38 sales representative for Lawson in the</p> <p>18 western half of the United States. I did that job for</p> <p>19 approximately three years.</p> <p>20 In 1986 I became a regional sales manager.</p> <p>21 I moved out to California in 1987 to start Lawson's</p> <p>22 first remote office, and I was a regional sales</p>
<p>14</p> <p>1 interface that goes into our UNIX systems.</p> <p>2 Q And what is the release date of the IBM</p> <p>3 software that provides the 50 -- is it 5150 emulation?</p> <p>4 A Yes, it might be 5150 or 5250. I'm not</p> <p>5 sure. It's the green screen version of the systems.</p> <p>6 It copyrights -- copyrights back to the 1980s. That's</p> <p>7 all I know about that specific version.</p> <p>8 Q And what's the release date of the emulator</p> <p>9 that allows you to -- is it Telnet --</p> <p>10 A Telnet.</p> <p>11 Q -- UNIX system?</p> <p>12 A I don't know what the date is.</p> <p>13 Q And is that -- are those interfaces licensed</p> <p>14 by Lawson Software?</p> <p>15 A Yes, I assume they are.</p> <p>16 Q Are they licensed from IBM?</p> <p>17 A I don't know.</p> <p>18 Q When were these interfaces placed on your</p> <p>19 work station at Lawson?</p> <p>20 A Last Thursday they were put on my system.</p> <p>21 Q And did you ask -- what was the name of the</p> <p>22 gentleman who placed them?</p>	<p>16</p> <p>1 manager there until 1990.</p> <p>2 In 1990 I came back to the twin cities,</p> <p>3 Minneapolis and St. Paul, and I was a sales</p> <p>4 representative for our procurement distribution</p> <p>5 systems for about a year through 1991.</p> <p>6 And then Lawson broke its sales force up</p> <p>7 into salespeople that managed the accounts and people</p> <p>8 who demonstrate and managed the actual presentation of</p> <p>9 our software. I did that job from 1991 through 1997.</p> <p>10 Q Let me just stop you there for a second.</p> <p>11 A Go ahead.</p> <p>12 Q You said Lawson broke its sales force up</p> <p>13 into sales people that managed the accounts into</p> <p>14 salespeople who demonstrated and managed the</p> <p>15 presentation.</p> <p>16 A Of our software.</p> <p>17 Q Of the software.</p> <p>18 Which side of that divide were you on from</p> <p>19 the --</p> <p>20 A I was on the presentation of the software</p> <p>21 systems.</p> <p>22 Q Okay, go ahead. I'm sorry.</p>

<p style="text-align: right;">17</p> <p>1 A And then from 1997 through 1999, I worked in</p> <p>2 our partner program setting up and working with</p> <p>3 partners of Lawson who help resell our software. And</p> <p>4 I was the -- I trained our partners on how to sell and</p> <p>5 install and run Lawson in a demonstration environment.</p> <p>6 I also helped them present our solutions. And I had a</p> <p>7 team of three or four individuals who also helped in</p> <p>8 the presentation of our software.</p> <p>9 And then in 2000 -- actually 1999, Lawson</p> <p>10 set up a new division to sell our software to</p> <p>11 professional services organizations, and I was a</p> <p>12 product specialist there and a manager of the</p> <p>13 presentation staff. And I did that job through 2002.</p> <p>14 And in 2002 I went back into the general</p> <p>15 pool of presenters again, our solution consultants, in</p> <p>16 our services industries area, did that from 1992 to,</p> <p>17 excuse me, 2002 through 2005.</p> <p>18 And then in 2005 through 2008, I was in our</p> <p>19 government segment of selling Lawson Software to</p> <p>20 government, schools and institutions.</p> <p>21 And then in 2008 through 2010, I've been in</p> <p>22 our services industries group presenting our solutions</p>	<p style="text-align: right;">19</p> <p>1 in 1990 or were they not yet commercially available?</p> <p>2 A They were not commercially available. They</p> <p>3 were on our sales servers and we were allowed to</p> <p>4 present them at that point.</p> <p>5 Q You were presenting them to prospective</p> <p>6 customers, but you weren't yet commercially selling</p> <p>7 them to customers?</p> <p>8 A Once there was a sale, then there became --</p> <p>9 we could contract and supply the software, but it</p> <p>10 wasn't considerably generally accepted or generally</p> <p>11 available at that point, which it became in 1991.</p> <p>12 Q When in 1991 did the 5.0 system become</p> <p>13 generally available?</p> <p>14 A I don't have a specific date.</p> <p>15 Q Do you recall whether it was the first half</p> <p>16 or the second half of the year?</p> <p>17 A It would be in the first half of the year,</p> <p>18 somewhere in there.</p> <p>19 Q And you said that your next role at Lawson</p> <p>20 was as -- you moved into the presentation of software</p> <p>21 from '91 through '97; is that correct?</p> <p>22 A Right, that's correct.</p>
<p style="text-align: right;">18</p> <p>1 to our clients and to new prospects.</p> <p>2 Q Let's go back to 1990. You mentioned in</p> <p>3 1990, you transitioned to become a sales</p> <p>4 representative for procurement software distribution?</p> <p>5 A Yeah, we sell our purchase order inventory</p> <p>6 and requisition modules as what we call procurement</p> <p>7 for internal supply of items. We also have an order</p> <p>8 entry system that we were selling at that point, and</p> <p>9 that would be called our distribution area,</p> <p>10 distributing products for profit.</p> <p>11 Q And what were your responsibilities as a</p> <p>12 sales representative for that division?</p> <p>13 A I managed a territory in the East Coast. I</p> <p>14 found prospects. I made sure they were qualified, did</p> <p>15 the sales presentations, closed accounts and made sure</p> <p>16 they were happy after -- once they were installed.</p> <p>17 Q What version of the procurement software was</p> <p>18 being sold in 1990 by Lawson?</p> <p>19 A The 5.0 systems were coming to market.</p> <p>20 That's what I was selling.</p> <p>21 Q When you say they were coming to market,</p> <p>22 were they already available -- commercially available</p>	<p style="text-align: right;">20</p> <p>1 Q And was that presentation of specific types</p> <p>2 of software?</p> <p>3 A I did all of our financial systems then. So</p> <p>4 general ledger, accounts payable, accounts receivable,</p> <p>5 asset management. I did those, and I also did</p> <p>6 procurement, purchase order inventory requisitions.</p> <p>7 And then I also did our order entry systems.</p> <p>8 Q And when in 1991 did you transition to that</p> <p>9 role?</p> <p>10 A It would have been in June when we switched</p> <p>11 the sales force over. That was our fiscal --</p> <p>12 beginning of the calendar year for '92.</p> <p>13 Q And by that point was version 5.0 of Lawson</p> <p>14 Software already commercially available?</p> <p>15 A Yes, from my understanding, it was, yes.</p> <p>16 Q What were your responsibilities in</p> <p>17 presenting the procurement software, was it to</p> <p>18 potential customers or to --</p> <p>19 A Potential customers or existing customers</p> <p>20 that did not have those systems yet.</p> <p>21 Q Okay. And what were your responsibilities</p> <p>22 as a presenter of the procurement software to</p>

<p>33</p> <p>1 which the system is running, was first commercially</p> <p>2 available?</p> <p>3 A I have no idea, no.</p> <p>4 Q Do you know when the PA-RISC operating</p> <p>5 system was first commercially available?</p> <p>6 A No.</p> <p>7 Q Do you know when the IBM iSeries -- is that</p> <p>8 a server?</p> <p>9 A It's a server style. It's the successor for</p> <p>10 the AS/400 series. The AS/400 came out in -- it goes</p> <p>11 -- well, the system 38 was first before that, which</p> <p>12 was in 1980. In 1988 came the IBM AS/400 series, and</p> <p>13 the iSeries is something probably in the early 2000s,</p> <p>14 from my understanding.</p> <p>15 Q So the IBM iSeries is a server that you</p> <p>16 believe was first available in the early 2000s; is</p> <p>17 that right?</p> <p>18 A Yes, the iSeries specifically.</p> <p>19 Q And which system that you're going to be</p> <p>20 demonstrating today is running on the IBM iSeries?</p> <p>21 A The 6.1 system.</p> <p>22 Q So the 5.0 and the 6.0 systems will be</p>	<p>35</p> <p>1 about when that HP UNIX server was first available?</p> <p>2 A No, not the specific style. Lawson's been</p> <p>3 running on the HP series since the early 1990s.</p> <p>4 Q So there's a specific type of HP UNIX server</p> <p>5 that Lawson runs its certain software on?</p> <p>6 A That's correct.</p> <p>7 Q Do you know what that model number is for</p> <p>8 that specific type of HP UNIX server?</p> <p>9 A No, I do not.</p> <p>10 Q Who at Lawson would know the specifics about</p> <p>11 the HP UNIX server that the systems that you'll be</p> <p>12 demonstrating today, the 5.0 and 6.0 systems, will be</p> <p>13 running on?</p> <p>14 A Roger Shimada would know that.</p> <p>15 MR. STRAPP: Would it be possible, maybe</p> <p>16 this question is better directed at your counsel, to</p> <p>17 determine at a break some more information about that</p> <p>18 HP UNIX server, both the model number and the date it</p> <p>19 was available?</p> <p>20 MR. SCHULTZ: Yes, we could do that.</p> <p>21 MR. STRAPP: Thank you.</p> <p>22 A The model number is on page 4.</p>
<p>34</p> <p>1 running on HP UNIX server?</p> <p>2 A That is correct.</p> <p>3 Q And the 6.1 system will be running on the</p> <p>4 IBM i server?</p> <p>5 A Correct.</p> <p>6 Q Where are these servers, the HP UNIX server</p> <p>7 and the IBM i server physically located?</p> <p>8 A They're located in St. Paul at our third</p> <p>9 floor of the Lawson offices.</p> <p>10 Q So these are servers that are owned and</p> <p>11 maintained by Lawson at their premises?</p> <p>12 A Yes.</p> <p>13 Q Can you tell me what, besides this</p> <p>14 demonstration that we're doing today, what else does</p> <p>15 Lawson use the HP UNIX system for currently?</p> <p>16 A HP under UNIX, and they also have a Windows</p> <p>17 version, are systems that we support for our current</p> <p>18 product line.</p> <p>19 Q So you have Lawson Software 9.0 running on</p> <p>20 this HP UNIX server?</p> <p>21 A Yes.</p> <p>22 Q And you're not -- you don't have any idea</p>	<p>36</p> <p>1 Q Okay.</p> <p>2 A It tells you the model, processor, memory</p> <p>3 and disc that's on that particular piece of hardware.</p> <p>4 Q Okay. So it's the model RP3440 for the HP</p> <p>5 UNIX server?</p> <p>6 A That's correct.</p> <p>7 Q And I assume Roger could tell us at a break</p> <p>8 when that model RP3440 was first available?</p> <p>9 A He could or you would have to do research</p> <p>10 because he doesn't buy those systems or acquire them.</p> <p>11 He's just a tech that supports them.</p> <p>12 Q But he could find out someone who might know</p> <p>13 that information.</p> <p>14 A Most likely he could find it.</p> <p>15 Q Okay. Let's look at page 4 while we're on</p> <p>16 it. The HP UNIX has a system name prhtec01. Is that</p> <p>17 a Lawson system name for that particular server?</p> <p>18 A Yes.</p> <p>19 Q And the operating system running on that</p> <p>20 server is the PA-RISC operating system?</p> <p>21 A That is correct.</p> <p>22 Q And what version of the PA-RISC operating</p>

<p style="text-align: right;">177</p> <p>1 module we're looking at for Lawson 6.0?</p> <p>2 A Requisition Self-Service used a shopping</p> <p>3 basket concept. It also used an idea of segregating</p> <p>4 items into categories. And that was something that we</p> <p>5 had a purchase order.</p> <p>6 When -- when Requisition Self-Service became</p> <p>7 available, those categories became requisition lists.</p> <p>8 So I could say corporate, here's my list for computer.</p> <p>9 And I worked in the government sector, so we had</p> <p>10 police items and we had maintenance items, and they</p> <p>11 became -- you could click on that and then go right</p> <p>12 into a specified list and just select items you want</p> <p>13 and drop them right into the shopping basket.</p> <p>14 Q So you could search by category in</p> <p>15 Requisition Self-Service, by category of items?</p> <p>16 A Well, those categories actually -- they</p> <p>17 weren't a search. We predefined them. So you just</p> <p>18 selected one -- say you were at a location and you had</p> <p>19 office supplies and let's say non-stocked items. You</p> <p>20 could click on those and it would just show you the</p> <p>21 default items that were defined. And then you could</p> <p>22 go into that list and click on the ones you wanted or</p>	<p style="text-align: right;">179</p> <p>1 you told them you can't use 9.0 anymore, we're going</p> <p>2 to have to switch you back to Lawson 5.0 or Lawson 6.0</p> <p>3 with respect to the procurement software, would that</p> <p>4 be okay for a customer today?</p> <p>5 A An impossible -- excuse me, a customer would</p> <p>6 not be happy with that functionality.</p> <p>7 MR. STRAPP: Why don't we take a five-minute</p> <p>8 break.</p> <p>9 THE VIDEOGRAPHER: Going off the record.</p> <p>10 The time is 3:19 p.m.</p> <p>11 (A brief recess was taken.)</p> <p>12 THE VIDEOGRAPHER: Back on the record. The</p> <p>13 time is 3:40 p.m.</p> <p>14 BY MR. STRAPP:</p> <p>15 Q Can you go back to the requisitions module</p> <p>16 in 6.0 that we were looking at, please.</p> <p>17 A Okay, uh-hmm.</p> <p>18 Q All right. Now, can you run a search in the</p> <p>19 requisitions module for a particular description?</p> <p>20 A I'm going to the item master file now and I</p> <p>21 do a select and I get to pick which one I want. Say</p> <p>22 it's item master. Then here I do a find as a function</p>
<p style="text-align: right;">178</p> <p>1 put a quantity and click add or just click add and it</p> <p>2 would drop them into the shopping cart.</p> <p>3 It also had the ability to suspend a</p> <p>4 shopping cart, which is something requisitions does</p> <p>5 not do as a shopping cart. It also could print from</p> <p>6 there, so we could print off in the requisition</p> <p>7 system. So I'm on a remote location, I want to print</p> <p>8 it, I print it locally.</p> <p>9 So it had a bunch more functionality than</p> <p>10 "standard" requisition, but the Requisition</p> <p>11 Self-Service also runs through RQ10 to actually create</p> <p>12 the record. So the RQ Self-Service had more</p> <p>13 functionality from a look and feel standpoint, but it</p> <p>14 also created the record from RQ10. You could do no</p> <p>15 more or no less from RQ10 from creating a final record</p> <p>16 in the system.</p> <p>17 Q But from the point of view of the user, it</p> <p>18 had a lot more different functionality than</p> <p>19 requisitions did?</p> <p>20 A It was simpler.</p> <p>21 Q Do you think it would be acceptable to a</p> <p>22 Lawson customer today using Lawson Software 9.0, if</p>	<p style="text-align: right;">180</p> <p>1 key and then you can do the item description search</p> <p>2 right here. Like I would say I use item, and then I</p> <p>3 press enter and then it finds the first one with an</p> <p>4 item. And then the find next key for the next item,</p> <p>5 next item, next item.</p> <p>6 Q Okay, now, if you -- let's build a</p> <p>7 requisition with one of the -- with the first item</p> <p>8 that showed up after you ran that search.</p> <p>9 A So I'm going to go back and I'm going to</p> <p>10 clear the whole form out now. Do you want me to do a</p> <p>11 search or just pick one?</p> <p>12 Q Why don't you do a search.</p> <p>13 A Okay, I'll just do it on books here.</p> <p>14 Q Okay.</p> <p>15 A So there's paperback books, I find it, I</p> <p>16 press enter, type a quantity in and then I can at this</p> <p>17 point -- do you want any more items at this point or</p> <p>18 just to be finished with the requisition?</p> <p>19 Q Let's just be finished with the requisition.</p> <p>20 So you're building the requisition. Now</p> <p>21 that you've built the requisition, can you see the</p> <p>22 associated vendor with this particular item?</p>

<p style="text-align: right;">189</p> <p>1 the dot zero dot 1, 2, 3. And so the functionality is</p> <p>2 the same, but patches get installed to fix minor</p> <p>3 issues within the software.</p> <p>4 Q You also mentioned, there was a question</p> <p>5 regarding would the customer be happy if they --</p> <p>6 using -- a customer of the 9.0 system had to go back</p> <p>7 and use a 5.0 or 6.0 system. And you said -- what --</p> <p>8 what do you recall saying?</p> <p>9 A I said in the Requisition Self-Service area,</p> <p>10 they would not be happy with it.</p> <p>11 Q Why not?</p> <p>12 A It's not that they lose functionality. It's</p> <p>13 that they look and feel significantly easier to work</p> <p>14 with in the Requisition Self-Service module.</p> <p>15 Q Okay. When you say they don't lose</p> <p>16 functionality, what do you mean?</p> <p>17 A When you go to Requisition Self-Service, it</p> <p>18 always processes through the standard requisition</p> <p>19 program, so they can do functionally all of the same</p> <p>20 things that they can do in RQ10, but it's not in the</p> <p>21 nice user interface of a shopping basket.</p> <p>22 Q Other than the shopping basket, is there any</p>	<p style="text-align: right;">191</p> <p>1 in, they could -- they could go on to a template,</p> <p>2 bring up all the items in that template and then</p> <p>3 select the ones they wanted to use in RQ10. That</p> <p>4 template is -- is still there today, and when you</p> <p>5 bring up Requisition Self-Service, the template</p> <p>6 becomes the catalog. So there's no more rekeying to</p> <p>7 it. It just comes up under a different name. The</p> <p>8 reason it's in a different name is because users in</p> <p>9 this current environment don't understand the</p> <p>10 template, but they understand how to buy off a catalog</p> <p>11 since it's a common metaphor in today's business</p> <p>12 world.</p> <p>13 Q So the term catalog that's used is the same</p> <p>14 thing as the template that was used in 5.0 and 6.0?</p> <p>15 A It's identical.</p> <p>16 Q Are you familiar with webrec?</p> <p>17 A Not personally, no.</p> <p>18 Q Are you familiar with webrec being the</p> <p>19 predecessor to the RSS program?</p> <p>20 A I've heard the name, but I never used it in</p> <p>21 any kind of detailed fashion at Lawson.</p> <p>22 Q You mentioned that there's a self-evident</p>
<p style="text-align: right;">190</p> <p>1 functionality on the requisition process that's</p> <p>2 different from a customer who's using only RQ to a</p> <p>3 customer who's using RSS?</p> <p>4 A No, they're the same functions.</p> <p>5 Q And the RSS also incorporates the</p> <p>6 functionalities of the PO and IC?</p> <p>7 A Through that process it always goes in --</p> <p>8 the Requisition Self-Service creates a requisition.</p> <p>9 It goes through the approval. Once it's in that part,</p> <p>10 it's in the back office and it's following the back</p> <p>11 office systems, the purchase order, inventory and</p> <p>12 matching systems.</p> <p>13 Q Okay. So when you say the back office,</p> <p>14 that's the purchase order, the inventory control and</p> <p>15 the requisitions modules?</p> <p>16 A That is correct.</p> <p>17 Q You also mentioned that with an RSS there</p> <p>18 are categories. Is that the same thing -- is there a</p> <p>19 similar thing to categories with respect to the 6.0</p> <p>20 and 5.0 systems?</p> <p>21 A Yes, those are -- the original idea was</p> <p>22 creating a template so when a requisition user went</p>	<p style="text-align: right;">192</p> <p>1 application or SEA. What is that?</p> <p>2 A It was a precursor to Requisition</p> <p>3 Self-Service. We also had them in human resources and</p> <p>4 in payroll that were designed, this is to prove out</p> <p>5 the concept of going on the web. And as those designs</p> <p>6 were proved out, then they became commercially</p> <p>7 available and we -- we renamed them things like</p> <p>8 Requisition Self-Service, Manager Self-Service, Human</p> <p>9 Resources Self-Service, those kind of ideas.</p> <p>10 Q When you brought up -- switching topics now.</p> <p>11 When you brought up the 5.0 system that was developed</p> <p>12 on the 2.0 environment from 1993, do you recall that?</p> <p>13 A Yes.</p> <p>14 Q And that was on the product line cobdeliv?</p> <p>15 A That is correct.</p> <p>16 Q It had no data in it, correct?</p> <p>17 A It has very limited data. In inventory it</p> <p>18 appears as none.</p> <p>19 Q When -- when software code was delivered to</p> <p>20 customers in the 5.0, 6.0 Legacy systems, was it ever</p> <p>21 delivered with code -- with data?</p> <p>22 A With data? No, it's never delivered with</p>

<p style="text-align: right;">209</p> <p>1 FURTHER EXAMINATION BY COUNSEL FOR PLAINTIFF</p> <p>2 BY MR. STRAPP:</p> <p>3 Q Okay. So we have some additional questions.</p> <p>4 We would like to introduce some additional exhibits as</p> <p>5 well.</p> <p>6 First, you were just asked by counsel for</p> <p>7 Lawson whether the functionality of the current</p> <p>8 versions of purchase order, inventory control and</p> <p>9 requisitions have changed since version 5. Do you</p> <p>10 recall being asked that question?</p> <p>11 A Yes.</p> <p>12 Q And is it fair to say that the functionality</p> <p>13 of those modules that Lawson purchased -- is it your</p> <p>14 testimony that the functionality of those modules</p> <p>15 within the procurement software that Lawson offers has</p> <p>16 not changed since version 5 in the early '90s?</p> <p>17 A It has had additional functions brought into</p> <p>18 it, but the -- the substance of creating a</p> <p>19 requisition, creating a purchase order, creating a</p> <p>20 receiver and creating a match business-wise are</p> <p>21 identical.</p> <p>22 Q So is it fair to say, then, that customers</p>	<p style="text-align: right;">211</p> <p>1 by Lawson, sorry, you can't use 9.0 anymore, you need</p> <p>2 to use the procurement modules for 5.0?</p> <p>3 A We have never done that for a client.</p> <p>4 Q And you never would, correct?</p> <p>5 A No, it wouldn't be good business practice.</p> <p>6 Q You testified just recently that Lawson 5.0</p> <p>7 has capability of search functionality within the</p> <p>8 requisitions module in the 5.0; is that correct?</p> <p>9 A That is correct.</p> <p>10 Q Could you pull up -- well, to clarify,</p> <p>11 there's two different versions of Lawson 5.0. There's</p> <p>12 -- that you would demonstrate today. One is the one</p> <p>13 running on UNIX Universe 2.0 from 1993 that has no</p> <p>14 data in inventory and item master, correct?</p> <p>15 A That is correct.</p> <p>16 Q So we can't go into that to build a</p> <p>17 requisition or search because there's no data,</p> <p>18 correct?</p> <p>19 A That is correct.</p> <p>20 Q So let's open up the version of 5.0 that's</p> <p>21 either the cyclical or support version running on UNIX</p> <p>22 Universe 2.1 from 1995, and if you could go into the</p>
<p style="text-align: right;">210</p> <p>1 of Lawson using Lawson 9.0, if they were told by</p> <p>2 Lawson that they needed to switch back to the</p> <p>3 procurement modules available in the early '90s with</p> <p>4 version 5.0 wouldn't have a problem since the basic</p> <p>5 functionality is the same?</p> <p>6 A The functionality would not cause them any</p> <p>7 issues. How it navigates and works on their current</p> <p>8 systems wouldn't even exist.</p> <p>9 Q In other words, they would not be able to</p> <p>10 use those systems today? Current customers of Lawson</p> <p>11 Software using version 9 would not be able to use</p> <p>12 Lawson Software 5.0 today, right?</p> <p>13 A They could if they had the existing hardware</p> <p>14 in the old operating systems.</p> <p>15 Q And are you aware of a single customer of</p> <p>16 Lawson Software that would be capable of running</p> <p>17 Lawson 5.0 today?</p> <p>18 A Not 5.0, but I do know of 6.0 ones, they do</p> <p>19 exist. Nothing in major number, but they still are</p> <p>20 there.</p> <p>21 Q And would it be an available and acceptable</p> <p>22 alternative for a customer using 9.0 today to be told</p>	<p style="text-align: right;">212</p> <p>1 requisitions module, I would like to see the search</p> <p>2 functionality you were describing.</p> <p>3 So are you now in the requisitions module</p> <p>4 for 5.0?</p> <p>5 A That is correct.</p> <p>6 MR. SCHULTZ: Jimmy, could we take a break?</p> <p>7 MR. STRAPP: Sure, let's go off the record</p> <p>8 for a minute, please.</p> <p>9 THE VIDEOGRAPHER: Going off the record.</p> <p>10 The time is 4:48 p.m.</p> <p>11 (Discussion off the record.)</p> <p>12 THE VIDEOGRAPHER: Back on the record. The</p> <p>13 time is 4:49 p.m.</p> <p>14 BY MR. STRAPP:</p> <p>15 Q All right. So we're now in requisitions</p> <p>16 module 5.0?</p> <p>17 A That is correct.</p> <p>18 Q All right. And can you demonstrate for me</p> <p>19 how to run a search here?</p> <p>20 A So you can go in and do a select and find</p> <p>21 your items and then put in a group number or</p> <p>22 description like ZEZ and find the item and then drop</p>